CBA COMMUNITY BROADCASTERS ASSOCIATION
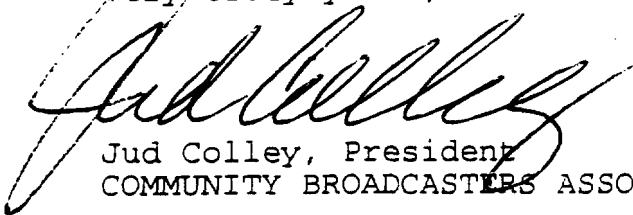
December 28, 1993

Mr. William F. Caton, Secretary
Federal Communications Commission
Washington, DC 20554

     Re: Report of Ex Parte Communication
        MM Docket No. 87-268
        MM Docket No. 92-259
        MM Docket No. 93-114

Dear Mr. Caton

Pursuant to Section 1.1206(a)(2) of the Commission's Rules,
submitted herewith are copies of ex parte written communications
to Commission decision-making personnel concerning matters under
consideration in the above-referenced docketed rule making
proceedings.

Very truly yours,

Jud Colley, President
COMMUNITY BROADCASTERS ASSOCIATION

JC/kc

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CBA COMMUNITY BROADCASTERS ASSOCIATION

December 28, 1993

Reed E. Hundt, Chairman
Federal Communications Commission
1919 M St., N.W., Room 814
Washington, DC 20554

Dear Chairman Hundt:

I am writing on behalf of the Community Broadcasters Association
to welcome you as the head of our regulatory agency and to
introduce you to the low power television industry (LPTV) which
CBA represents.   I hope to come to Washington in January or
February and would like to have an opportunity to meet with you
during that trip.

There are over 1,300 authorized LPTV stations -- almost as many
as full-power stations. Although we have fewer economic
resources and command less attention in Washington political
circles than the full-power TV industry, our members are
providing important over-the-air local programming to many small
cities and towns and minority communities in larger cities that
would otherwise be unserved by either the television or cable
industries. In fact, Washington, D.C.'s two Spanish language
television stations (Channels 42 and 48) are both LPTV stations.

LPTV is a secondary service in terms of spectrum occupancy but
not in terms of service to the public. Yet it has been difficult
for our small business enterprises to persuade Washington policy-
makers to remember our needs. Our pictures arrive over the same
airwaves and look the same on television receivers as those of
full-power stations, yet we have been trying for two and one-half
years to persuade the Commission to allow us to use the same
four-letter call signs that full power stations use so that
audience ratings services and advertising agencies can enter our
stations into their computers. We have been ignored in the
effort to create an advanced television table of frequency
allotments, even though we have asked for nothing more than to
have our channels used for ATV last rather than first. Congress
left most of our stations out when it adopted must-carry
legislation, so most of us must rely on leased channel access to
get on cable; but the Commission's leased channel access rules
permit cable operators to charge unconscionable rates, which they
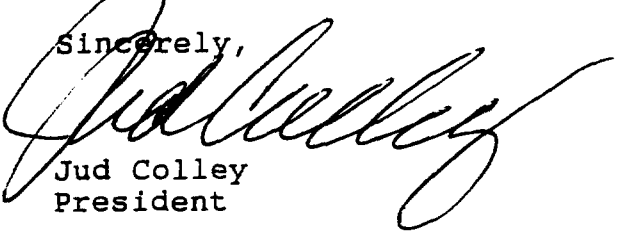are quick to do when the lessee is a potential competitor for
advertising sales.

It is difficult to predict what will happen to the visual media in the coming years of national mega-mergers and 500-channel video delivery; but I am absolutely sure that there will always be a need for the localized community service that LPTV provides, and there is no indication that giant conglomerates are interested in providing that service.

CBA held its fifth annual convention, and its first in Washington, last month. Commissioner Quello was kind enough to be our keynote speaker. We plan to return to Washington in 1994 to put our industry better in touch with the Commission and Congress. Meanwhile, we hope that you will remember the service we are providing and will encourage policy-makers in your own agency and elsewhere in Washington to take our service into account in their decision-making.

We look forward to working with you and the Commission during the coming years, and I hope to be able to meet you soon.

Sincerely,

Jud Colley
President

cc: The Honorable James Quello
    The Honorable Andrew Barett
    The Honorable Ervin Duggan
    Secretary, for inclusion as es parte communication in
        MM Docket 87-268
        MM Docket 93-114
        MM Docket 92-259